

# EXHIBIT C

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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**SECURITIES AND EXCHANGE** :  
**COMMISSION,** :  
: Plaintiff, : **16 Civ. 1619 (BRM) (JAD)**  
: -against- : **ECF Case**  
**GUY GENTILE,** :  
: Defendant. :  
-----X

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S  
SUPPLEMENTAL INITIAL DISCLOSURES**

Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, Plaintiff Securities and Exchange Commission hereby makes the following supplemental initial disclosures:

**GENERAL DISCLOSURE**

These disclosures reflect the results of a search of the Commission's existing files compiled in its investigation and during the pendency of this matter.

**SPECIFIC DISCLOSURES**

**A. Witnesses**

Set forth below is the name and, to the extent known by the Commission, the address and phone number of additional individuals currently known to the Commission who is likely to have discoverable information that the Commission may use to support its claims in this action other than for purposes of impeachment. The Commission may learn during discovery of additional individuals within the scope of Rule 26(a)(1)(A)(i) and, if necessary, will supplement these responses at the appropriate time.

| Person or Entity  | Contact Information                  | Relevant Knowledge  |
|---|--------------------------------------|---|
| Members of the staff of the Securities Commission of the Bahamas                                | REDACTED<br>[REDACTED]               | Matters relating to the September 2019 temporary suspension of SureTrader/Swiss America Securities/MintBroker International, Ltd. pursuant to Sections 133(1)(b) and (f) and 133(3) of the Bahamas Securities Industry Act of 2011        |
| Members of the staff of the Office of the Commissioner of Financial Institutions of Puerto Rico | REDACTED<br>[REDACTED]<br>[REDACTED] | Communications to and from Mint Bank International, LLC and/or Gentile (a/k/a Guy Gentile Nigro) in connection with Mint Bank International, LLC's application for a permit to establish an international financial entity in Puerto Rico |
| Persons associated with F1TRADE   | REDACTED<br>[REDACTED]               | Ownership of business; transfer of accounts from SureTrader/Swiss America Securities/MintBroker International, Ltd. in or around November 2019  |
| Nicholas Abadiotakis  | REDACTED<br>[REDACTED]               | Ownership and operation of Mint Global Markets, Inc., Mint Global Holdings, Inc., and The Stock USA Trust   |

In addition to the persons identified above, persons not yet identified and related to parties who produced documents to the Commission in its investigation may have relevant information concerning the authenticity and admissibility of the records produced.

B. Documents

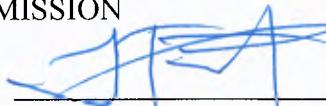
The Commission may learn during discovery of additional documents within the scope of Rule 26(a)(1)(A)(ii) and, if necessary, will supplement these responses at the appropriate time.

C. Damages

Plaintiff seeks no monetary relief or “damages.” It seeks remedial relief, or injunctions, pursuant to Sections 20(b) and (g) of the Securities Act of 1933, and Sections 21(d)(1), (5) and (6) of the Securities Exchange Act of 1934, in a form to be approved by the Court on a full evidentiary record.

Dated: February 3, 2020  
New York, New York

SECURITIES AND EXCHANGE  
COMMISSION

By:   
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